

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

PPG Industries, Inc.

ATTENTION:

Niki Chapin
EH&S Manager

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring PPG Industries, Inc. (PPG or you) to submit certain information about your facility located at 3800 N 143rd Street, Cleveland, OH. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the requirements for the information that you must submit. We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

PPG owns and operates an emission source. We are requesting this information to determine whether your emission source is subject to and complying with requirements for any CAA permit, applicable State Implementation Plans, and CAA regulations, including, but not limited to, the New Source Performance Standards and the National Emission Standards for Hazardous Air Pollutants.

PPG must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

PPG must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, 42 U.S.C. § 7413 and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.


We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject PPG to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Gregory Gehrig at (312) 886-4434.

Date

11/21/17



Edward Nam
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B. **If the question requests numeric data, please provide this data in a Microsoft Excel format or similar.**
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copies.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in

image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating, or relevant to.

Appendix B

Information You Are Required to Submit to EPA

PPG must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) for your facilities within **45 calendar days** of receipt of this request for the PPG facility located at 3800 N 143rd Street, Cleveland, OH:

1. A summary of formulations used in the water-bourne paint making process since January 1, 2016. Be sure to indicate the percentage of volatile organic compounds (VOC) in each formulation by weight.
2. Pertaining to 40 C.F.R. Part 63 National Emission Standard for Hazardous Air Pollutants for Miscellaneous Coating Manufacturing, Subpart HHHHH (NESHAP Subpart HHHHH):
 - a. Indicate which option you have selected for each emission limit, work practice standard and/or compliance requirement for process vessels, storage tanks, equipment leaks, wastewater streams, transfer operations, and heat exchangers.
 - b. Provide all records required to be kept per 40 C.F.R. § 63.8080 since January 1, 2016.
 - c. If applicable, provide all records required to be kept per 40 C.F.R. § 63.428 since January 1, 2016.
3. Provide an inventory of storage vessels with a capacity greater than 75 cubic meters (19,813 gallons) that holds or may hold volatile organic liquids. Provide the date of construction, reconstruction, or modification of each storage vessel. Provide the maximum true vapor pressure of the contents of each storage vessel since January 1, 2016. Terms for this item have the same meaning as in the 40 C.F.R. Part 60 New Source Performance Standards, Subpart Kb—Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.
4. Provide the reports or a full description of all incidents pertaining to the Excursions/Deviations noted in PPG's Title V Annual Compliance Certifications No. 141025, dated April 25, 2017, and No. 120382, dated April 28, 2016.
5. Provide VOC emission calculations for water-bourne paint production and laboratory operations for calendar years 2015 and 2016.
6. Provide the building ventilation balance study summaries for each building that routes emissions to the Regenerative Thermal Oxidizer (RTO) since January 1, 2013. Provide any corresponding modifications to the ventilation systems that occurred to those buildings as a result of those studies.
7. In subparagraphs 7.a. - 7.c. below, identify which compliance option PPG has selected under Table 3 of NESHAP Subpart HHHHH for Equipment Leaks:
 - a. 40 C.F.R. §§ 63.424(a) through (d) and 40 C.F.R. § 63.428(e), (f), and (h)(4), except as specified in § 63.8015(b); or

- b. Subpart TT of Subpart Part 63; or
 - c. Subpart UU of part 63, except as specified in 40 C.F.R. § 63.8015(c) and (d).
8. Provide the following records associated with your Equipment Leak Program since January 1, 2014.
- a. If the compliance option in subparagraph 7.a was selected:
 - i. The equipment leak log book as required by 40 C.F.R. § 63.424(b) and (c) and 40 C.F.R. § 63.428(e).
 - ii. If an instrument program was elected, provide the report described in 40 C.F.R. § 63.428(f).
 - b. If the compliance option in subparagraph 7.b was selected:
 - i. Equipment identification log as required by 40 C.F.R. § 63.1017(b)(1).
 - ii. Records for leaking equipment as required by 40 C.F.R. § 63.1017(b)(5).
 - iii. For each agitator, provide:
 - 1. The equipment identification number.
 - 2. Documentation of the agitator seal visual inspections and associated actions as specified in 40 C.F.R. § 63.1009(b)(3).
 - 3. Documentation of the design criteria and explanations and any changes and the reason for the changes, as specified in 40 C.F.R. § 63.1009(e)(1)(vi)(A).
 - iv. Identification and explanation of equipment that is designated as unsafe-to-monitor as required by 40 C.F.R. § 63.1003(d)(1).
 - c. If the compliance option in subparagraph 7.c was selected:
 - i. Equipment identification as required by 40 C.F.R. § 63.1022 (a) and (b).
 - ii. Records for leaking equipment as required by 40 C.F.R. § 63.1038(b).
 - iii. For each agitator, provide:
 - 1. The equipment identification number.
 - 2. Documentation of the agitator seal visual inspections and associated actions as specified in 40 C.F.R. § 63.1028(c)(3).
 - 3. Documentation of the design criteria and explanations and any changes and the reason for the changes, as specified in 40 C.F.R. § 63.1009(e)(1)(vi)(A).
 - iv. Identification and explanation of equipment that is designated as unsafe-to-monitor as required by 40 C.F.R. § 63.1022(c).
9. List the identification number of all the agitators that have dual mechanical seals at your facility. For each identified agitator, provide the following information since January 1, 2014:
- a. If the compliance option in either subparagraph 7.b or 7.c was selected, indicate if the agitators are:
 - i. Operated with the barrier fluid at a pressure that is at all times (except during periods of startup, shutdown, or malfunction) greater than the agitator stuffing box pressure; or
 - ii. Equipped with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed vent system to a control device that meets the requirements of 40 C.F.R. § 63.1015; or
 - iii. Equipped with a closed-loop system that purges the barrier fluid into a process stream. If so:

1. Is the barrier fluid in light liquid service?
2. Is the barrier fluid system is equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both?
 - a. If yes:
 - i. Describe what the sensor is monitoring.
 - ii. Is the sensor observed daily? If so, provide any records associated with these observations.
3. Is each agitator seal checked by visual inspection each calendar week for indications of liquids dripping from the agitator seal?
 - a. If yes, is the agitator monitored to detect a leak above 10,000 parts per million or greater of volatile organic compounds?
 - i. If yes, provide all records associated with the repairs.
 - ii. If no, is the agitator repaired to eliminate the visual indications of liquids dripping.
- iv. Is the agitator designed with no externally actuated shaft penetrating the agitator housing?
- v. Is the agitator routed to a process or fuel gas system or equipped with a closed vent system that captures and transports leakage from the agitator to a control device meeting the requirements of 40 C.F.R. § 63.1015?
 1. If yes, identify which one.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by
Certified Mail, Return Receipt Requested, to:



Niki Chapin
EH&S Manager
PPG Industries, Inc.
3800 N 143rd Street
Cleveland, OH 44111

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by email to:

Bob Hodanbosi
Chief
Division of Air Pollution Control
Ohio Environmental Pollution Control Agency
bob.hodanbosi@epa.ohio.gov

David G. Hearne
Interim Commissioner
Cleveland Department of Public Health
Division of Air Quality
dhearne@city.cleveland.oh.us

On the 22nd day of November 2017.


 Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7011150 0000 2643 8906